



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

NOV 06 2002

REPLY TO THE ATTENTION OF

EPA Region 5 Records Ctr.



236969

MEMORANDUM

SUBJECT: ACTION MEMORANDUM - Request for a Emergency Removal Action at the Mundelein Abandoned Drum Site, Lake County, Illinois (Site ID #B53Z)

FROM: Thomas D. Cook, On-Scene Coordinator
Emergency Response Branch - Section 3

TO: Rick Karl, Chief
Emergency Response Branch

I. PURPOSE

The purpose of this memorandum is to document your prior verbal approval to expend up to \$32,675 in order to mitigate threats to public health, welfare, and the environment at the Mundelein Abandoned Drum Site in the city of Mundelein, Illinois, and to document oral approval of a \$15,000 response cost ceiling provided by you on July 10, 2002. This response action is necessary to mitigate the immediate threat to public health and the environment posed by illegally dumped drums.

The Mundelein Abandoned Drum Site is not on the National Priorities List (NPL).

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID # ILN000508526

A. Physical Location and Description

The Site is located behind a Fruit Market business at 360 Townline Road, Mundelein, Illinois. The Site is predominantly grassy vegetation to the north and asphalt to the south.

Regarding Environmental Justice (EJ) matters in Illinois, the low-income percentage is 27 and the minority percentage is 25. To meet the EJ concern criteria, the area within

1 mile of the site must have a population that's twice the state low income percentage or/and twice the state minority percentage. That is, the area must be at least 54% low-income and/or 50% minority. At this site, the low-income percentage is 40% and the minority is 50% as determined by Arcview or Landview III EJ analysis. Therefore, this site meets the region's EJ criteria based on demographics as identified in "Region 5 Interim Guidelines for Identifying and Addressing a Potential EJ Case, June 1998".

B. Site Background:

On July 10, 2002, an employee of a business located in a shopping center at 360 Townline Road notified the Mundelein Fire Department of illegally dumped drums. The Mundelein Fire Department notified the Illinois Environmental Protection Agency (IEPA) of the incident. IEPA mobilized to site and began to characterize the contents of the drums including: five 55-gallon drums, four 30 gallon drums, and fourteen 5- gallon buckets. IEPA tested the drums for their lower explosive limit (LEL) and collected one Draeger tube sample which tested positive for trichloroethylene (TCE). The drum potentially containing the substance with TCE was labeled as a dry cleaning product. IEPA then notified the U. S. Environmental Protection Agency (U.S.EPA) for assistance. On July 10, 2002, the U.S. EPA activated the Superfund Technical Assessment and Response Team (START) contractor and the Emergency and Rapid Response Services (ERRS) contractor. START and ERRS immediately began mobilization of personnel and equipment which arrived on site at 1500 hours.

START members met U.S. EPA On-Scene Coordinator (OSC) Thomas Cook and Edward Osowski of the IEPA at the site. IEPA, U.S. EPA, and START performed a site reconnaissance. An absorbent boom was placed on the pavement because solvent from the drums was draining toward the sewer. START conducted further characterization of the drums by monitoring with a photo ionization detector (PID). Readings ranged between 92 and 1,278 parts per million (ppm). START performed a flammability test, which was negative, and a copper wire test, which was positive for the presence of chlorinated compounds. START collected five TCE Draeger tube samples of the drums, which ranged from 30 to 250 ppm. START collected a composite sample of the contents from a 30-gallon drum and a 5-gallon bucket, which was taken by the ERRS contractor to a laboratory for PCB analysis. The laboratory determined that the preliminary results for PCB analysis indicated that the waste is not PCB contaminated with 90% certainty.

The characterization of all of the drums and buckets appeared to be similar. Therefore, the contents of the five 55-gallon drums, the four 30-gallon drums, and the fourteen 5-gallon buckets were bulked together in three 55-gallon drums for disposal. The empty drums were cut up and bagged for disposal. START collected samples from two of the drums of composited material for waste disposal characterization.

ERRS dug a test pit of the stained area around the previous location of the drums. The

contamination appeared to be only on the surface of the soil. ERRS began removal of the contaminated soil and placed it into 55-gallon drums for disposal. START collected soil samples from the excavated soil for waste disposal characterization. The liquid and soil samples were delivered to Severn Trent Laboratory in University Park, Illinois.

At 2230 hours, ERRS completed removal of contaminated soil. A total of three 55-gallon drums containing approximately 115 gallons of liquid waste, twelve 55-gallon drums containing solid waste, and 9 bags of debris were collected for disposal. ERRS marked off the area of excavation. START and ERRS demobilized from the Site. START and ERRS proceeded to the Mundelein Public Works facility to store a total of fifteen 55-gallon drums and nine bags of debris until disposal can be arranged.

III. THREATS TO PUBLIC HEALTH, WELFARE, OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions at Mundelein Abandoned Drum Site present an imminent and substantial threat to the public health, or welfare, and the environment and meet the criteria for a removal action provided for in the National Contingency Plan (NCP), Section 300.415, Paragraph (b)(2). 40 CFR § 300.415(b)(2)(i), specifically allow removal actions for:

- 1) Hazardous substances or pollutants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;

Numerous drums in the grass area, most of which were full or partially full, pose a threat of release. Preliminary hazard categorization indicated that several drums demonstrated the presence of ignitable properties. The drums were stacked two to three on top of one another.

- 2) Weather conditions that may have caused hazardous substances or pollutants or contaminants to migrate or be released;

The drums and containers were exposed to a variety of weather conditions that could have caused their contents to release and migrate. High temperatures, rain events and high winds, could have caused drums to rupture, overfill, or tip and release contents.

IV. ENDANGERMENT DETERMINATION

Given the site conditions, the nature of the hazardous substances on Site, and the potential exposure pathways described in Sections II and III above, actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

The OSC undertook the following actions to mitigate threats posed by the presence of abandoned drums:

- 1) Developed and implemented a site health and safety plan;
- 2) Developed and implemented an air monitoring program;
- 3) Developed and implemented a site security plan and contingency plan;
- 4) Removed and properly disposed of (in accordance with U.S. EPA's Off-Site Rule [40 CFR § 300.440]) illegally abandoned drums.

Removal activities required one on-site day to complete. Subsequently, it required three weeks for U.S. EPA contractors to make arrangements for the disposal of the flammable liquids and nonhazardous waste water resulting from the removal action. After the disposal arrangements were finalized, these materials were shipped to the disposal locations. The threats posed by the identified hazardous waste materials meet the criteria listed in Section 300.415(b)(2) of the NCP and are consistent with any removal action which may be required.

The OSC has initiated planning for provision of post-removal site control consistent with the provisions of Section 300.415(l) of the NCP. The nature of this removal action, complete removal of illegally abandoned drums and any contaminated media from the site, will eliminate the need for any post-removal site control.

The detailed cleanup contractor cost estimate is presented in Attachment 1 and estimated project costs are summarized below:

REMOVAL PROJECT CEILING ESTIMATE

EXTRAMURAL COSTS:

Cleanup Contractor	\$18,000
Subtotal	\$18,000
Total START	<u>\$11,375</u>

Extramural Subtotal	\$29,375
TOTAL EXTRAMURAL COSTS	\$29,375
<u>INTRAMURAL COSTS:</u>	
U.S. EPA Direct Costs	\$ 1,350
\$30 X [(30 Regional Hours)+ 15 HQ Hours]	
U.S. EPA Indirect Costs	<u>\$ 1,950</u>
\$65 X (30 Regional Hours)	
TOTAL INTRAMURAL COSTS	\$ 3,300
	=====
TOTAL REMOVAL PROJECT CEILING ESTIMATE	\$32,675

The response actions described in this memorandum directly address the actual or threatened release at the site of a hazardous substance, or of a pollutant, or of a contaminant which may pose an imminent and substantial endangerment to public health or welfare or to the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

Applicable or Relevant and Appropriate Requirements

All applicable, relevant, and appropriate requirements (ARARs) were complied with to the extent practicable. All hazardous substances, pollutants, or contaminants removed off Site pursuant to this removal action for treatment, storage, and disposal were treated, stored, or disposed of at a facility in compliance, as determined by U.S. EPA, with the U.S. EPA Off-site Rule, 40 CFR § 300.440, 58 Federal Register 49215 (September 22, 1993).

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

NONE

VII. OUTSTANDING POLICY ISSUES

NONE

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this site is contained in the Enforcement Confidential Addendum. The total EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$53,839 ¹

$$(32,675 + 6000) + (39.21\% \times 38,675) = \$53,839$$

IX. RECOMMENDATION

This decision document represents the selected removal action for the Mundelein Abandoned Drum Site developed in accordance with CERCLA, as amended, and is not inconsistent with the National Contingency Plan (NCP). This decision is based upon the Administrative Record for the site. Conditions at the site meet the NCP Section 300.415(b)(2) criteria for a removal and I recommend your approval of the proposed removal action. The total project ceiling, if approved, will be \$32,675. Of this, an estimated \$29,375 was used for cleanup contractor costs. You may indicate your decision by signing below.

APPROVE: _____

Richard Karl
Branch Chief, Superfund Division

DATE: _____

11-6-02

DISAPPROVE: _____

Branch Chief, Superfund Division

DATE: _____

Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States's right to cost recovery

Attachments

1. Detailed Cleanup Contractor Cost Estimate
2. Administrative Record Index
3. EJ Analysis map

cc: R. Worley, U.S. EPA, 5202-G
M. Chezik, U.S. Department of the Interior, **w/o Enf. Addendum**
R. Cipriano, IEPA, **w/o Enf. Addendum**

**PAGE 8 HAS BEEN REDACTED AS IT CONTAINS A
BCC LIST NOT RELEVANT TO THE REMOVAL
ACTION.**

**THE ENFORCEMENT ADDENDUM FOR THE
MUNDELEIN ABANDONED DRUM SITE HAS BEEN
REDACTED AS IT IS NOT RELEVANT TO THE
REMOVAL ACTION.**

ATTACHMENT 1

DETAILED CLEANUP CONTRACTOR ESTIMATE
MUNDELEIN ABANDONED DRUM SITE
CHICAGO, COOK COUNTY, ILLINOIS
AUGUST 2001

The estimated cleanup contractor costs necessary to complete the removal action at the mundelein abandoned drum are as follows:

Personnel/ Equipment/Materials	\$10,886
Transportation and Disposal	<u>\$18,489</u>
TOTAL	\$29,375

ATTACHMENT 2

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

ADMINISTRATIVE RECORD
FOR
MUNDELEIN ABANDON DRUM SITE
MUNDELEIN, LAKE COUNTY, ILLINOIS

ORIGINAL
OCTOBER 22, 2002

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	00/00/00	Cook, T., U.S. EPA	Karl, R., U.S. EPA	Action Memorandum: Request for an Emergency Removal Action at the Mundelein Abandon Drum Site (PENDING)	

Region 5 Superfund EJ Analysis

Mundelein Abandoned Drum Site Mundelein, IL

